

**FILED**  
UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

W DEC 19 2018

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**TIMOTHY BOONE** and  
**BRANDON JIM**,

Defendants.

CRIMINAL NO. 18-4169 WJ

Count 1: 18 U.S.C. §§ 1153 and 1201:  
Kidnaping; 18 U.S.C. § 2: Aiding and  
Abetting;

Count 2: 18 U.S.C. §§ 1153 and 2111  
Robbery; 18 U.S.C. § 2: Aiding and  
Abetting;

Count 3: 18 U.S.C. § 924(c): Using and  
Carrying a Firearm During and in  
Relation to a Crime of Violence, and  
Possessing a Firearm in Furtherance of  
Such Crime; Brandishing  
Said Firearm;

Count 4: 18 U.S.C. §§ 1153 and  
113(a)(3): Assault with a Dangerous  
Weapon.

INDICTMENT

The Grand Jury charges:

Count 1

On or about May 2, 2016, in Indian Country, in McKinley County, in the District of New Mexico, the defendants, **TIMOTHY BOONE** and **BRANDON JIM**, Indians, did unlawfully kidnap, abduct, seize, and confine John Doe, an individual who had not attained the age of 18 years, and hold John Doe for ransom, reward, and otherwise.

In violation of 18 U.S.C. §§ 1153, 1201 and 2.

Count 2

On or about May 2, 2016, in Indian Country, in McKinley County, in the District of New Mexico, the defendants, **TIMOTHY BOONE** and **BRANDON JIM**, Indians, by force, violence

and intimidation, did take from the person and presence of John Doe, an individual who had not attained the age of 18 years, two cell phones, a fishing rod, a tackle box, a Nike sweatshirt, and ammunition for a .22 caliber rifle.

In violation of 18 U.S.C. §§ 1153, 2111, and 2.

Count 3

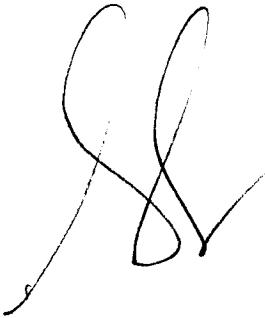
On or about May 2, 2016, in McKinley County, in the District of New Mexico, the defendant, **BRANDON JIM**, knowingly used and carried a firearm, during and in relation to a crime of violence, involving an individual who had not attained the age of 18 years, for which the defendant may be prosecuted in a court of the United States, specifically, robbery, as charged in Count 2, and in furtherance of such crime, possessed said firearm, and the firearm was brandished.

In violation of 18 U.S.C. § 924(c).

Count 4

On or about May 2, 2016, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **TIMOTHY BOONE**, an Indian, assaulted John Doe, an individual who had not attained the age of 18 years, with a dangerous weapon, specifically, a knife, with intent to do bodily harm.

In violation of 18 U.S.C. §§ 1153 and 113(a)(3).



Assistant United States Attorney

12/18/18 2:06PM

A TRUE BILL:

/s/

FOREPERSON OF THE GRAND JURY